

TEXAS GROUNDWATER PROTECTION COMMITTEE
RECORD OF MEETING
Third Quarterly Meeting, Fiscal Year 2002

Meeting Date: May 16, 2002
Meeting No.: 52

Place: TNRCC Campus, Building F
Room: 2210

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MEETING ATTENDANCE

TGPC Members

Affiliation

Mary Ambrose	TNRCC
Janie Hopkins	TWDB
Ambrose Charles	TDA
Bridget Scanlon	BEG
Bill Harris	TAES
Lee Parham	TDLR
Ken Ofunrein	TDH
Barry Miller	TAGD
Donna Long	TSSWCB

RCT, TDH and TSSWCB members absent at roll call.

Agency Staff

Affiliation

Program

Cary Betz	TNRCC	Technical Analysis Division
Frank Fuller	TNRCC	Policy and Regulatory Division
Steve Musick	TNRCC	Technical Analysis Division
Alan Cherepon	TNRCC	Technical Analysis Division
David Parmer	TNRCC	Strategic Environmental Assessment
Greg Tipple	TNRCC	Remediation Division
Abiy Berehe	TNRCC	Technical Analysis Division
Kathy Ramirez	TNRCC	Policy and Regulatory Division
Debbie Danford	TDA	Asst. Commissioner's Office
Jeanette Ohare	TDA	Risk Assessment & Toxicology
Bob Deschamps	TNRCC	
Mike Hess	TNRCC	
Chris Chandler	TNRCC	
Becky Kurka	TNRCC	
Monte Dozier	TAES/NRCS	

Interested Parties

Affiliation

Lynne Fahlquist	USGS
Ann Ardis	USGS

MEETING HANDOUTS

1. Agenda
2. Agricultural Subcommittee Report
3. TGPC Record of Meeting , Second Quarter Meeting, FY 2002
4. Groundwater Research Subcommittee - Draft Charge
5. Legislative Report Subcommittee - Subcommittee Charge
6. TNRCC Rules Tracking Log
7. TGPC Rule Log Update on May 16. 2002
8. Texas Groundwater Protection Committee, Title 31 - Natural Resource and Conservation Chapter 601 - Groundwater Contamination Report
9. Discussion Draft State Groundwater Protection Strategy Timeline - Revised 2/21/01(sic)
10. Texas State Groundwater Protection Strategy Discussion Draft May 15, 2002 9:18 am

MEETING RECORD OF MAY 16, 2002

I. Call to Order and Introductions

Mary Ambrose, Designated Chairman of the Texas Groundwater Protection Committee (TGPC), called the FY2002, Third Quarterly Meeting to order at approximately 1:08 p.m., CDT.

II. Subcommittee Reports -

Agricultural Chemicals - Steve Musick, TNRCC, Chair. The Agricultural Chemicals Subcommittee held its FY 2002 third quarter meeting on May 16, 2002, at 10:00 a.m.

Members were updated on the TWDB sampling program for the Carrizo-Wilcox aquifer and the minor aquifers: the Queen City, the Sparta and the Yegua-Jackson. TNRCC staff reported that only minor concentrations of metolachlor had been detected in the approximately 100 samples received at this point.

No activity has been reported on the EPA draft PMP rule. TDA reported that there will be SFIREG Water Quality Work Group and APCO will hold meetings during the summer hopes some information will be forthcoming at that time.

The Subcommittee heard a presentation from TNRCC staff responsible for the Source Water Protection Program, and were updated on the data and reporting activity of that program.

The Site Selection Task Force reported on their upcoming investigative work to complete the study of the detects of atrazine in some of the public water supply wells in Hereford and Plainview. Two sampling trips are scheduled for this summer to collect additional water quality sampling data, and to collect data regarding potential sources of contamination.

The Subcommittee heard announcements, in particular an announcement from TNRCC that in the current budget cycle for grants from EPA, that the FIFRA grant for groundwater work has been reduced by 50%. This situation is a recent development, and no estimation of the impact of these cuts has been made as yet.

Data Management - Cary Betz, TNRCC, representative. The Data Management Subcommittee has not formally met since the last Committee meeting. Work has continued on compiling data for the Joint Groundwater Monitoring and Contamination Report -2001, with the last program area contributing their data on the first of May, a full month behind the mandated due date of the report. At present, all data has been compiled and staff has been verifying and cross-checking data and text.

Staff hopes to perform some trend analysis on the case data; but at this point, time may

not allow such analysis. Preliminary numbers indicate that there are 7,283 cases, compared to 7,567 cases for calendar year 2000. The RCT showed a net increase of 16 cases, the TAGD reported a net decrease of nine cases, and the TNRCC a net decrease of 291 cases. No detailed analysis of which program areas experienced decreases has been made, but initial examination indicates cases decreased across the board for TNRCC.

Preparation of Texas' contribution to the 2002 National Water Quality Inventory Report, or "305(b)" Report has been postponed until after the Joint Groundwater Monitoring and Contamination Report 2001 is completed. The "305(b)" report is now scheduled for submission to EPA in October 2002. A side note, the 2000 edition of the "305(b)" report was finally sent to publication during the second week of May 2002. No editorial changes were made to the groundwater portion of the report submitted by the Committee in July of 2000.

Abandoned Water Well Closure Task Force - Cary Betz, TNRCC, representative. A water well closure demonstration was held in Victoria County on April 22, 2002. The demonstration also served as a follow-up program to a well water quality program conducted by the Texas Cooperative Extension. Two types of wells were closed as part of the demonstration - a "stovepipe" type casing and a larger steel casing about 6 inches in diameter, were closed. Approximately 30 people attended the event, and several indicated that they would be closing old wells on their property based on what they had learned at the demonstration. Bruce Lesikar, chair of the Abandoned Water Well Closure Task Force gave credit to Victoria County Extension Agent Sam Womble for arranging this event.

The question arose as to whether there were other events scheduled, and staff reported that no additional information had been received on a proposed event for Hamilton County. Bill Harris reported that the Extension Service had been contacted by Haskell County officials to conduct another well closing demonstration in October in conjunction with a water well educational program - this demonstration would supplement an event held earlier in the year in Haskell County under record setting inclement weather conditions.

Groundwater Protection Strategy Work Group - Frank Fuller (TNRCC) reported that the strategy work group has not met this quarter. A draft has been circulated to all member agencies, and the RCT's comments have been integrated into the draft presented today. However, the comments from the Remediation Division of TNRCC have not been integrated into the draft. Additional changes will be discussed in detail under the action item portion of the agenda.

III. Presentation

Preliminary Water Quality Findings of the Ogallala Aquifer, Southern High Plains - Lynne Fahlquist, United State Geological Survey. The USGS is conducting a study of the High Plains Aquifer system throughout its entire region, as part of the National Water

Quality Assessment (NAWQA) Program. This presentation focuses on the southern portion of the High Plains Aquifer in northwestern Texas work in Texas and eastern New Mexico. Approximately 48 landowners agreed to participate in this program and allow USGS personnel to sample wells on their land, and several groundwater conservation districts also assisted in the sampling efforts.

The study objective was a broad scale assessment of water quality conditions and distribution of both natural and anthropogenic (man-affected) compounds that may be found in water. The study did not look at detailed groundwater contamination problems in the area, or sources, but was instead limited to determining what chemical constituents are present.

The study area ran west from Amarillo and north from the Midland Odessa area, and included Hobbs and Clovis New Mexico. The study area is bounded by the Canadian River basin on the north, the drainage are of the Prairie Dog Fork of the Red River on the northeast, the Escarpment on the east, and Pecos River drainage on the west. The southern boundary is a little less clear, but is where the Ogallala thins and pinches out.

The coverage is 48 sites in a 29,000 square mile area, or approximately 1 well for every 500 square miles. The maps shown in the presentation revealed some gaps in the number of sites in the western and southern parts of the study area, and these gaps were an artifact of the saturated thickness of the Ogallala or that wells in the areas were completed across more than one aquifer.

Sites are selected by using a computer program that chooses random locations in order to eliminate any bias, such as selection of sites in areas of known contamination. Once a random site has been delineated, a search for suitable wells is conducted. Well selection criteria included that wells must be completed only within the Ogallala, as the program is assessing water quality of the High Plains Aquifer System from Texas to South Dakota, and the Ogallala in Texas is the equivalent for other parts of the aquifer system out of the state.

Drinking water wells are preferred, and all of the wells sampled are used for that purpose. Construction details, including a driller's log, must be available for the wells. A sampling access point must be available for obtaining samples before the water enters any pressure or treatment system. Additionally, there must be a way that water levels could be measured so that the top zone of production could be determined. If water levels could not be measured, then there had to be an historical record of water well levels available.

USGS sampled for approximately 250 constituents including field parameters of pH, dissolved oxygen, temperature, turbidity, and conductance which are measured before other samples are obtained. Other constituents include major ions; trace elements (22 compounds, mostly metals); nutrients such as nitrogen, phosphorous, dissolved organic carbon; 110 pesticide compounds (including degradates); 85 Volatile Organic

Compound's; Radon gas and Tritium.

Samples are collected by USGS personnel using dedicated equipment and a "clean" mobile lab. A rigorous QA protocol is followed by all staff collecting samples throughout the study areas across the High Plains. Analysis is performed by the USGS laboratory, and the cost is approximately \$2000 per sample.

Fluoride is well known to be a constituent of concern in the High Plains, and the study confirms concentrations above the primary and secondary MCL's for fluoride in the southern part of the study area. Dissolved solids are another well known constituent of concern, and again, the study confirms higher dissolved solids concentrations in the southern part of the study area.

The USGS has looked at data nationally and has defined a "background" concentration for nutrients at 2 mg/l. Anything less than this is considered naturally occurring. Since the norm for the central portion of the study area is known to be greater than this, a more conservative value of 4 mg/l was used as background. Values for nitrate did show to be higher than the norm for some locations in the study area, however, high concentrations did not appear to be as widespread as previously believed. There may be higher concentrations at select localities, but these are not reflected in this study.

Radon has a proposed standard for drinking water of 300 pico-curies per liter, and a number of the wells have measurements above the proposed standard.

From the 48 wells sampled, only six Volatile Organic Compounds were detected. Of these, four were found to be related to disinfection of wells, and two of the compounds detected at one well were found to be the result of recent re-plumbing of the well (PVC solvent glue related compounds). This study found no other VOC's in the study area, indicating that VOC's are not a problem in groundwater, despite abundant oil field activity in the area.

Of the 48 wells sampled, 15 had pesticides detected at above the Minimum Recommended Level. Of those wells 12 had atrazine or atrazine degradates and three other pesticides were found only once. The occurrence of atrazine was most common in vicinity of Lubbock and Crosby counties.

Trace element analysis included arsenic - only one site in Lynn county showed a concentration above the old standard of 50 mg/l. With the recent change in the standard down to 10 mg/l, there are significantly more sites with concentrations greater than this new standard. The concentrations may be related to cotton farming, but could also be related to the subsurface geology that can contribute arsenic to the environment.

IV. Business - Discussion & Possible Action

Texas Groundwater Protection Strategy - Frank Fuller, TNRCC, Steve Musick,

TNRCC. The strategy document has been reformatted and the recommendations have been enhanced. Today's discussion is intended to focus on the recommendations. The Committee is scheduled to vote to publish the draft for public comment at the July meeting, and members are to take the draft and any discussion from today's meeting up the executive chain of their respective agencies and see if anyone has any "heartburn" or concern over any of the recommendations or other aspects of the strategy. Comments need to be returned to staff a couple weeks prior to the July meeting. Assistance from TNRCC publications staff will be enlisted after today's meeting to get the draft document professionally edited and into a presentation format.

The first recommendation was to strengthen the lines of communication between the Committee and the Regional Water Planning Groups.

The second recommendation recognized that there is no routine examination of drinking water supplies for rural homes, and proposed some form of outreach program to increase the understanding of groundwater contamination issues.

The data management section recognized that there is a gap in ambient groundwater monitoring and brought forth a recommendation that the number of sampling locations be increased and that the suite of constituents tested for also be expanded.

Another recommendation is that the Committee needs to actively promote data standards and data guidelines.

Another need is placing location information for groundwater contamination sites on websites for GIS data exchange.

There is a recognition that some "naturally occurring" constituents such as nitrate and arsenic, need better assessment.

Recognition that historic hard copy water well information needs to be placed into an electronic format through the Texas Department of Licensing and Regulation Water Well Driller and Pump Installer Program.

Recognition that there is no formal mechanism to coordinate research efforts between Committee members or to help find research funding.

Recognition that a member of the public has difficulty finding groundwater information that is directed to the general public as opposed to regulatory or scientific entities, and further recognition that the Committee's website could be enhanced to direct interested parties to that type of information.

There was some discussion concerning how data would be maintained in the databases, and according to what quality standard. Proposed TNRCC rules currently under consideration will require that data will be obtained from testing performed by NELAC

certified laboratories. “Grandfathering” of data is a concern, and even concerns data from programs that are currently underway.

The question was posed as to whether these requirements needed to be presented in the recommendations, and the consensus was that NELAC should be mentioned. Staff reported that many databases already contain “qualifiers” on the data in their databases, and that staff members of the various agencies are still wrestling with including or excluding historical data from existing databases that may not meet current data standards. Various groups in the state are working on this issue. There is no mention of NELAC in the data management section of the strategy, and this may be an area where we need to go back and look at this aspect.

There is also a finding that resources for the Tex*A*Syst program need to be increased so more rural landowners can benefit from the program.

Onsite wastewater treatment is considered in the strategy and proposed to benefit from increased partnerships with local governments to develop and deliver effective educational material that addresses septic system maintenance to prevent failures. It was also pointed out in the strategy discussions that the highest growth areas in the state are on the “suburban fringe” where landowners are using septic systems for waste treatment and/or are installing private wells for the first time, and that the state may want to develop programs directly specifically toward these high growth areas.

With respect to newly created groundwater conservation districts, the question was posed as to whether the strategy should reflect a commitment to educating newly elected officials of these districts. The representative from the TAGD stated that his organization was currently working to develop educational programs to get these people up to speed. One TNRCC staff member offered that there is definitely a need to carry the information to a wider group of people, and this would require the participation of a wider group of people other than TAGD. A recommendation might be that all Committee member agencies should work with these newly created districts to inform them of the resources that are available.

June 14 was established as the deadline for comments from all Committee members in order to prepare a final draft for distribution to and concurrence by agency heads. Two subjects, the incorporation of NELAC into the data management chapter, and the addition of assistance to groundwater conservation districts by member agencies, are to be addressed by staff and distributed to the members for review within two weeks.

Research Needs Subcommittee - Creation and Charge - One of the proposed recommendations that came out of the strategy work session in January, 2002, was the desire for a subcommittee to identify and coordinate groundwater research needs. During the second quarterly meeting of the Committee, a subcommittee was proposed, and Committee members requested that a “charge” for the subcommittee was to be developed and presented during this meeting.

The expected results of this subcommittee will be to have the responsibility to report their activities to the Texas Groundwater Protection Committee during the regular quarterly meetings, and identify research needs. The subcommittee should first evaluate previous efforts to identify research needs, and determine the effectiveness of these efforts, including whether the identified projects are still needed. Also the subcommittee should identify successful funding mechanisms. The TNRCC is presently developing a research model, and the subcommittee should try to work with the TNRCC group doing the work to identify research needs.

The second task for this subcommittee will be to present to the full Committee an operational plan for identifying interagency research needs and methods to provide a coordinated approach for prioritizing projects and finding potential funding sources.

The idea behind this subcommittee is to bring together the Committee members that are primarily interested in program implementation and those that have research and study functions, to identify research projects that will hopefully benefit more than one agency, and then to look for combined resources to fund that kind of research.

The Committee needs to determine if this is an appropriate charge for this subcommittee, and then to appoint people to this subcommittee so that they can get started. There is a first year project in the charge which is going though what has been done in the past and coming up with a plan to determine how things will be done in the future.

The Chairman proposed that the two research entities that are members of the Committee, the Texas Agricultural Experiment Station and the Bureau of Economic Geology, co-chair the Groundwater Research Subcommittee, and this was agreed to by both entities.

The representative from TAES raised one issue - the prioritization of research needs. Creating a "laundry list" of research needs is one thing, but it is an entirely different thing to collectively prioritize a listing that could then be used by these two entities and others in coming together to make sure that you are dealing with the highest priority research needs that will help facilitate other things - program administration, answer some of the critical problems. As a result, the Committee needs to build into this input from others or some sort of process for project prioritization.

The Chairman then questioned if it made sense to include a methodology for prioritizing research needs in the draft strategy. The TAES representative said that adding a statement including this methodology would be satisfactory. Should the Committee vote on the prioritization? The Chairman responded that this may be something that the subcommittee might want to work up to present to the full Committee - an initial methodology that they are wanting to use. The BEG representative suggested that as they actually go through the process, that they may be able to develop a methodology, instead of being locked into something. The TAES representative also noted that funding quite often determines priority.

The Chairman then opened discussion to membership on the subcommittee. She encouraged members to think about prospective candidates. The TWDB identified Ruben Ochoa from their planning group, and TAES identified Allan Jones as their representative. The BEG representative also volunteered to serve on this subcommittee. Donna Long will represent the TSSWCB. The participation of outside entities, such as the USGS, is encouraged.

Reactivation of Legislative Report Subcommittee - approve schedule and appointment of members - Frank Fuller, TNRCC.

The legislature requires that the Committee report every two years, prior to the legislative session. The plan is to follow past procedures, activating a subcommittee to draft a report and recommendations to present to the full Committee for discussion, distribution to members' management for comment, and return to the Committee for final discussion and approval.

The recommendations portion of the report is the more "sticky" portion of the report, but agency descriptions and lists of activities are included. The time line has a subcommittee meeting in June, with presentation of the rough draft during the 4th quarterly meeting to get a general idea of the direction the recommendations are taking. Late August or September will have another subcommittee meeting to finalize draft report and prepare for recommendation presentation to the full Committee. Agency management will hopefully review and comment on the draft during October, and the final draft will be presented again to the full Committee during the first quarterly meeting for FY 03. Once the document is approved, it will enter the TNRCC publications process and be distributed to legislature prior to the statutory deadline for submission of December 31.

During this quarterly meeting the subcommittee must be reactivated, and prospective members identified. A proposed outline for the report is presented today, and some of the recommendations made in the last report are also available for members to review. The subcommittee is charged with looking at past recommendations and also reviewing the recommendations developed during work on the strategy.

If more than five designated Committee members are also members of the subcommittee, then the meetings of the subcommittee are subject to the requirements of open meetings legislation, and may then need to be held in conjunction with regular quarterly TGPC meetings. The Chairman of the Committee offered to chair the legislative subcommittee again this time. Stefan Schuster was designated as the representative for TWDB. TDA named Bo Spoons as their representative. Barry Miller will represent TAGD, and Allan Jones will represent TAES.

The subcommittee has worked on recommendations in the past and e-mailed drafts out to other members, so not being on the subcommittee will not exclude anyone from receiving timely information on the subcommittee's activities. The Chairman indicated that she would speak with other members to confirm their representation on the subcommittee at a later date.

Notice of intent to review and propose the readoption of 31 Texas Administrative Code Chapter 601, Groundwater Contamination Report and to propose amendments to 31 TAC §§601.2, 601.3, and 601.5. - Mary Ambrose, TNRCC. These rules cover the preparation of the Joint Groundwater Monitoring and Contamination Report. These rules have been modified to reflect the TDLR as a Committee member, and to reflect the name change of the TNRCC to the Texas Commission on Environmental Quality, which is scheduled to take place September 1, 2002.

Committee members have before them the adoption package. No comments were received from the public during the 30 public comment period. The proposed quadrennial review determined that the rule does need to exist. The Texas Register publication announced these proposed changes as changes to Title 30 instead of Title 31, however, there is no problem associated with this administrative error.

The representative from TAGD moved to adopt both the rules and the rules review. The motion received a second from the TSSWCB representative. There was no discussion. The motion passed without dissent.

Next meeting date: July 25, 2002, 1:00 p.m. TNRCC Campus.

V. Information Exchange for Groundwater Related Activities/Status Update

Joint Groundwater Monitoring and Contamination Report - 2001- update

Joint Groundwater Monitoring and Contamination Report - 2001 should be sent to publication prior to June 1. Publication is anticipated within a week or two of this date.

Texas Source Water Assessment and Protection Program - update

No representative from the Texas Source Water Assessment Program is present, so there was no update on this program. Steve Musick, TNRCC, said that SWAP staff made a presentation to the Agricultural Chemicals Subcommittee at their meeting this morning. SWAP staff indicated that the program was still on schedule to get their GIS databases and assessment methodology from the USGS this summer in a beta format. Assessment work will start in September, with completion some time in 2003 (May 31, 2003 is the final deadline). Most of the data will be available through internet, except for some data that is "sensitive" and subject to homeland security consideration.

VI. Announcements

Rules Update: TNRCC, TWDB, RCT

TNRCC rule tracking log - Kathy Ramirez, TNRCC. A summary of the rule log was distributed to members. There has been little change since the last meeting. Two rules talked about at the last meeting have been adopted, the quadrennial review for Chapter 213 was adopted on May 8, 2002. The Chapter 290 technical corrections were adopted on April 26, 2002. These do not appear on your handouts, as they were adopted, the handout reflects only those rules where there is still some type of action in progress.

The handout is self-explanatory, so it will not be discussed, except for the rule covering the injection well ban for the Edwards Aquifer. The processing of the rule previously had some dates associated with it, but those have been removed until staff resolves some technical issues that have arisen. Some other process dates have changed, including the radionuclides standards for drinking water has been pushed back from May 8 and the adoption date for Edwards Aquifer protection plans has been moved up by a month as no comments were received during the 30 day comment period. The quadrennial review for the Chapter 290 Public Drinking Water has been moved up by three months.

Since the Committee was discussing NELAC earlier, there are copies of the rules available. The rules are scheduled for adoption August 21, 2002. Steve Stubbs is the program lead on these rules. His telephone number is (512) 239-6343, and he should be able to assist you with all questions.

The TWDB is presently in the process of drafting rules on the process for designating groundwater management areas. The maps will be up on the TWDB website until July 31, 2002 for comment. TWDB is requesting input on different scenarios: one based on drawing management areas on aquifer boundaries; another based on an overprint of aquifer boundaries and taking into consideration groundwater district and regional planning group boundaries; the final is an overprint on aquifer boundaries, with consideration of county lines to prevent counties from being split. Under any of these plans, groundwater districts will need to coordinate with other districts in their management area on issues affecting common aquifers. Districts that cannot reach an agreement will have TNRCC intervene to find a solution.

The RCT representative could not be present at today's meeting, but reported to the Chairman via e-mail that there was nothing new to report on rule amendments. The NORM and water protection statewide rules are in the comment period.

New Publications

TNRCC in cooperation with TSSWCB has published the Non-Point Source Annual Report. There are a number of interesting groundwater related project in this publication. Contact is Linda Brookins with TNRCC. Annual report is also on both agencies websites.

USGS has an online publication [The Results of Streamflows Gain/Loss Studies in Texas](#)

The TWDB reports a new feature on their website - new hydrographs from a number of water wells are now online and realtime.

TAES has a publication on the Extension program for sampling water wells for fecal coliform and for nitrates. Since 1999 TAES has sampled approximately 3400 private water wells for these contaminants. There are also new publications on how to take care of bacteria if present and a publication on nitrates is currently in draft/peer review. All of

this will be available on the internet when published. The program will be performing field test screening for lead in Wharton county as a pilot this year.

Upcoming Conferences

There is a schedule of ITRC internet training programs included in members' packets.

The National Water Monitoring Council is having their annual conference next week in Madison Wisconsin, and the Methods and Data Comparability Board is having a meeting June 11 - 15, 2002.

An Ambient Monitoring Network Design Conference is scheduled for the week of June 2 - 8, 2002 in Fort Collins Colorado.

The EPA is having a meeting of Region VI states, the recipients of groundwater 106 grants, June 18 -20, 2002, in Oklahoma City.

The Groundwater Management Districts Association is having a meeting June 12 - 14, 2002.

There is a groundwater/surface water interaction conference in Keystone Colorado July 1 - 4, 2002.

Members are encouraged to pick up posters commemorating the 30th anniversary of the Clean Water Act, and to remember October 18, 2002, as National Water Quality Monitoring Day.

The Invasive Riparian Plants in Texas Water Task Force is next Thursday at the Capitol Annex at 9:00 a.m.

The State FIFRA Issues Research and Evaluation workgroup meets June 24 - 25, 2002.

The Agriculture Resource Protection Authority meets June 3, 2002, at Texas Department of Agriculture.

The Texas Water Monitoring Council will be holding their Texas Water Monitoring Congress on September 9 - 11, 2002 at the J. J. Pickle Research Center Campus Texaswaterinfo.net is their website.

VII. Public Comment

None

VIII. Adjourn

Chair Mary Ambrose adjourned meeting at approximately 3:19 p.m., CDT.

Respectfully submitted,